January 28, 2020

Ryan Barlow
Acting Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN  55101

RE: STAKEHOLDER MINUTES
COMMUNITY SOLAR GARDENS
DOCKET NO. E002/M-13-867

Dear Mr. Barlow:

Northern States Power Company, doing business as Xcel Energy, submits the attached Compliance information in response to the Commission’s February 13, 2015 Order (Order Point 3) submitted in the above-noted docket. Per Commission Order, all agendas, approved minutes and attachments from the Solar*Rewards Community (S*RC) Implementation Workgroup will be filed in eDockets. Attachment A includes the meeting minutes for our November 7, 2019 workgroup.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Jessica Peterson at Jessica.K.Peterson@xcelenergy.com or 612-330-6850 if you have any questions regarding this filing.

Sincerely,

/s/

SHAWN WHITE
MANAGER, DSM & RENEWABLE REGULATORY STRATEGY AND PLANNING

Enclosure
c: Service List
AGENDA
S*RC IMPLEMENTATION WORKING GROUP

Thursday, November 7
Xcel Energy, 401 Nicollet Mall – Bay 6
1:00 – 3:30 p.m.
Phone: 612.330.5656 or 1-866-672-3839 Participant Code: 497-800
Web: https://avayaconference.xcelenergy.com/497800

1:00 Welcome and Approval of Minutes (David)

1:10 Program Detail Discussion (Crystal/Rehana/Cale)
   a. Program Status
   b. E911 and Billing Information
   c. Late Fees Expectations
   d. Proof of Site Control Clarification
   e. Portal Update
   f. Billing & Subscribers
   g. REC Claims

1:45 Engineering Update (John/Alan/Ed)
   a. Study Timing Update
   b. Cluster Study Pilot
   c. “No Upgrades Required” Threshold
   d. Restudy Extensions in long queues
   e. Site Shifts

- Intermission -

2:30 Design/Construction Update (Dave/Brenda)
   a. Energization/Acceptance Schedule – 2019/2020
   b. Overall Update

3:00 Regulatory Update (Crystal/Kerry)
   a. Outages – Processes and Reporting Requirements
   b. Privacy Rules
   c. Single-Meter Solution Billing

3:15 Open Discussion & Wrap-up (David)
**OPENING**

This session of the S*RC Implementation Workgroup was called to order at 1:00 p.m. on November 7, 2019 by David Shaffer (MnSEIA).

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**APPROVAL OF MINUTES**
Workgroup attendees approved the meeting minutes from August 7, 2019, with two edits – Ross Abbey was in attendance, and there was a typo in the construction section (one word was switching to “timing”).

**MEETING MINUTES**
*See Document A for Presentation*

I. **Program Detail Discussion**

**Program Details**
Xcel Energy sent their SRCMN Update Email out a couple weeks ago regarding these requirements: E911 Address – Assigned to developers by Authority Having Jurisdiction (AHJ), this is usually the local City or County. In order to verify the physical site address, please provide documentation confirming the E911 from the AHJ. Developers can also submit the amendment to correct for the listed address in the Interconnection Agreement. Use the E911 to complete the FastApp, to establish an account and premise #’s, which will set up a CSG in our billing and metering system. Premise #’s need to be submitted at least 20 weeks prior to the ISD – meters cannot be order until this is established and available in the portal.

**Billing Contact Information**
Xcel Energy requested developers work with SRCMN to verify the entity listed and the postal address in our billing system, 10 days prior to energization. Xcel Energy wants checks/invoices to go to the right place upon final true-up. Developers will still work with the Business Solutions Center to make any updates.

**MNDIP Site Control**
Proof of Site Control is a state wide requirement. Xcel Energy is looking to verify two key components, in order to tie a developers proof of control over the site to the application.
1. **Entity** that has control of site needs to match the entity (LLC) on the application. Developers can submit an Assignment of a Lease if needed.
2. **Location** that developers have control over needs to match the location of the application – GPS Coordinates (Decimal Degrees-DD, not Degrees/Minutes/Seconds-DMS) & an exhibit with a Map/Diagram showing location that compares to site plan can help expedite review.

**Midwest Renewable Energy Tracking System (MRETS) & Energy Information Administration Number (EIA#)**
Garden Operator must register with EIA if 1MW or greater, per federal law, and will receive 5-digit EIA code within a week. Xcel Energy registers all Gardens with MRETS. Garden Operator must submit MRETS Schedule A & MRETS Registration Template to Xcel Energy, both with the EIA code included.

**Late Fee’s**
What to expect: When developers submit an Amendment for Extension to Mechanical Completion Date, and achieve Mechanical Completion late, they will receive a separate Late Fee invoice from
Meeting Minutes

SRCMN and a separate Final Interconnection invoice or check from Xcel Energy. (Amendments give ability to combine these but currently will not).

**Question:** Why can Xcel Energy delay completion and charge the site Late Fee’s for the In Service Date (ISD)?

**Answer:** Xcel Energy explained the difference between Mechanical Completion and ISD. Garden Operators can achieve Mechanical Completion without Xcel Energy – requirements are the garden must be built and pass electrical inspection, and have both insurance and testing procedures reviewed and approved.

**Question:** The issue as they have to wait on ISD for Xcel Energy.

**Answer:** Xcel Energy reaches out to ensure completion date matches the ISD, however if delays are caused because a site does not give us enough time to get design/construction done the Amendment is there. Xcel Energy tries to be transparent in our scheduling processes, and have made changes to witness testing/energization processes/timelines and it’s been working well with far less cancellations. However, this does not release site from the need to meet the Mechanical Completion Timeline.

**Question:** Why is there not a delay extension in the contract?

**Answer:** Projects can sit for a long time with nothing happening. It is not because of Xcel Energy that they cannot meet their Completion Date. Xcel Energy does not give waivers on that unless its day for day extension (as described below).

**Question:** Along with updates to the portal, will there be fields where the ISD date agreed upon can be an input, along with locked-in dates for Energization and Witness Testing?

Xcel Energy agreed that they can have conversations internally to see if they can accommodate that.

Mechanical Completion is based on specific milestones in the Solar*Rewards Community program – pegged off a program date and is for the program that it must be complete. ISD is scheduled with designer based on the design/construction needed, and is scheduled separately. If you receive a day for day extension because a study was received late; that is an extension for your Mechanical Completion Deadline, not the ISD date.

**Portal Changes**

Release #2 will happen early December 2019, and will look a lot different from portal currently used. All new projects will go through the new portal. Things to look forward to include: E-signatures, E-payments, and automated approval processes for insurance, testing procedures, as built engineering documents. Xcel Energy will provide additional training closer to the release date.

**Billing Issues**
Xcel Energy has received questions recently about Garden Operators not seeing the Monthly Owners Report (MOR) populate, some are concerned bill credits are delayed. These are two potential issues: 1) Delay in Bill Credits, and 2) Delay in MOR – which are not always related.

*Can be delays in bill credits:

1) *Backdating PTO can cause a delay:*

If a gardens testing date is the end of the month and there are back and forth items to be addressed afterward, and Xcel Energy then backdates PTO to a previous month, this can cause a delay to occur. Two solutions are that the Garden Operator can ensure all requirements are met the day of testing so that backdating does not occur, or Xcel Energy can stop backdating PTO, which Xcel Energy does not believe Garden Operators would want to do. If developers have unresolved requirements after testing, and PTO is issued after the test date into the next month, anticipate delays in bill credits and in the MOR.

**Question:** Even though it’s delayed a few days, there’s still 5-6 weeks between when this happens and the MOR should be happening. Why can’t 2-6 days be absorbed into a 5 week delay?

Xcel Energy explained that some are one off situations – it’s involved with numerous parties, and the overall volume of data that goes into it each month. If it happens more than once, definitely let them know so it can be looked into. Otherwise it is kind of a case-by-case basis based on different subscribers moving around each month. There are numerous variables.

Customers also do not get billed on the same day of the month. If it’s not caught on the first x days for example, it can get caught up in the billing cycles.

**Question:** Xcel Energy has two customer facing documents (FAQ & Billing Credit Timing), they are not able to point to these docs and say this will happen this way, and then not have it actually happen that way. A subscriber’s first impression and they are finally getting started, to not meet their expectations does a lot of damage to our credibility and that hurts the operators rather than Xcel Energy. Because subscribers are going to developer and saying the developer is doing a bad job.

**Answer:** If an issue like this happens reach out and let SRCMN know. Sometimes it will post after the subscribers have gotten their bill. Statement can post before the credit post, so customers will see it on their next bill. Xcel Energy can look into it and diagnose with other internal parties on each situation.

**Question:** There is not communication to prove there is a delay and it is not on the developer.

Xcel Energy explained that the reason they try to keep this separate is there are so many subscribers in the program, and it’s easier to educate the developers rather than the subscribers so they can assist each subscriber. Xcel Energy will implement something this spring that will mitigate a lot of these problems going forward.
**Question**: When you say it did not post on their statement date but it’s still applied, it does not show on the website on their account that it is applied. If they got it November 7th and its due December 7th, even though it’s applied the full bill in December is still due. It affects the subscriber negatively.

**Answer**: Let Xcel Energy know about anything coming up so that it can be addressed.

**Question**: Can there be communication to the developer ahead of time when the backdating PTO happens?

**Answer**: Xcel Energy can update documentation to better point to this going forward.

2) **Meter communications** – if those are not addressed there can be delays as well.

Xcel Energy gets a list monthly - some delays are on Xcel Energy’s side whereas they can dispatch technicians to resolve right away, some are on the developer’s end and are communicated to the PAM, who needs to resolve as quickly as possible (and alert their subscriber management team that there may be a delay in bill credits as a result).

**Question**: Best line of communication, who do I contact at Xcel Energy regarding metering?

**Answer**: Developers can always reach out to or include SRCMN, and the program can answer or direct your questions.

3) **Enrollment Changes**:

Whoever handles subscribers should be monitoring biweekly/daily, if a subscriber sits invalid, this can cause a delay and doesn’t only affect the subscriber.

**Question**: There are moving pieces every month, so what can the developer do?

**Answer**: Monitor that biweekly/weekly, and it’s never a problem to reach out to SRCMN multiple times a day, because we do not want subscriber to be affected

4) **Transferring data to MOR**

Billing is working on their end. Xcel Energy usually has about 100 or so a month with errors out of 17,000 unique subscribers, there will be some errors and we work quickly to get things back up as quickly as possible. Billing teams and off shore Sales Force teams are implementing different process checks to make sure they get posted in a timely manner. More of a random data transfer issue, not necessarily a new garden issue.

**Question**: Subscriber timeline, did you always want this done by the 25th of the month?

**Answer**: Yes. It depends on how developer wants to run their gardens/subscriptions, but it’s not a bad way to operate. Colorado operates this way and run into a lot less errors than Minnesota; it is a good rule of thumb.
Question: Do you need those 5 days to allocate the invalid subscribers?

Answer: It's an emergency buffer timeframe. The Allocation Snapshot occurs at midnight, at the end of each month.

Starting March 1, 2020 Subscriber Billing Dates will change to the 20th of each month. (This will likely be May 1st 2020).

- Will align with standard billing cycle
- Mitigate many errors
- Less prevalent questions from subscribers
- Came from speaking to a lot of developers about issues they see with this
- Change requires no action from developers
- We will have a communication going out to developers so they have heads up
- Metering Date stays the same; the billing statement date will change
- Credits still post on the 9th of the month. Statement date for the customer (bill date) will go out on the 20th so it will be the same every month for all subscribers, and there is enough time for credits to post and align with each bill. So it will streamline the credit posting and credit going out the next month.

Question: Is it possible to notify the operators when we will have a delay?

Answer: Some are unforeseen delays, but Xcel Energy can go back internally to check and see if they can receive additional communication and let developers know. Xcel Energy already do this for metering communications. If a developer has invalid subscribers or backdates PTO, they can expect to see delays.

Excess Bill Credits

When a subscriber has bill credits that exceed their monthly bill, they roll over to cover expenses the next month. If they continue to roll over and accumulate, they are bought by Xcel Energy and paid out once a year. If subscribers have questions the link to the customer facing webpage is www.xcelenergy.com/SolarRewardsCommunity, under Step 3 there are details on receiving bill credits.

Solar*Rewards Community was never intended to be a money maker. It is a solar alternative for customers who want to participate in solar but cannot do rooftop or onsite solar. The 120% subscription rule is based on annual usage, and any payouts are also annual.

This is the most frequent question Xcel Energy receives from subscribers, Garden Operators should be sure to set the appropriate expectation when signing subscribers up. This information is tools and resources for developers to use.

Program Updates Subscribers
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Door to Door Sales – Xcel Energy gets calls from different people, community groups, police, and customers.

Please work with your direct sales/marketing so they are clearly representing who they are with and their role in this program. If customers call us and say ‘are you going door to door’ we have to say no and it could possibly be legitimate, but it’s not Xcel Energy and instead potentially someone on behalf of the program itself.

Some communities require a peddler’s license so check in locally; police think it’s us and get angry if Xcel Energy has not received the license to do this.

REC Claims

Many customers make claims about their solar subscription – Xcel Energy has put together an easy to use resource to help people understand more about Renewable Energy Certificates (RECs), how they work with the SRC program and a guide on what customers can claim about subscriptions.

II. Engineering Update

Hosting Capacity

There is an exhaustive record in place through a MPUC proceeding on this. The new hosting capacity map went live this month. It contains more information than the previous version. Garden Operator feedback was very positive.

Pre-App Data Reminder

Data in pre-applications is existing and readily available, as part of MNDIP that means: desktop data. Xcel Energy cannot send an engineer out into the field for every application, therefore we provide what is readily available that can be shared. It remains for information only. The pre-application data does not provide a guarantee of capacity; the data is a snapshot and is not going to reflect queue activity after the pre-application report is sent.

Question: Have any data points changed?

Yes, there’s a section in MNDIP that details out what information Xcel Energy will provide, provided it is readily available.

Question: What stage does confirming equipment in the field happen?

Answer: Xcel Energy uses studies done before to ensure we have incorporated all upgrades and information from prior in queue projects. However we do not put boots on the ground until we are in the Detailed Design stage.
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**Question:** One pre-applications did not provide information about a wind farm, and there had already been projects ahead in queue that had already been through a full study, yet this DG was not included in the pre-application report.

**Answer:** There is always potential that pre-existing data that will not necessarily report into our models – perhaps it has not gone into our system or is not yet tracked. Xcel Energy is looking to make things analytically appropriate so they can maintain safety, reliability and giving accurate reports.

**Question:** Is there any standard remedy to the developer in that situation?

**Answer:** Pre-application requests are $300. There is not any compensation Xcel Energy can give for these. It should be used as one of many data points, and is meant to be indicative but not completely thorough.

**Question:** Are there ongoing efforts to bring that kind of external DER data into the online version in the background?

**Answer:** In 2016, Xcel Energy converted DERs to an online application system so it has electronically housed everything since then. They gathered everything and uploaded it, so now it is just the outlier information that they have not been able to include yet. Field verification of every line, etc. would be extensively expensive.

**Question:** Minimum loading data – how should we be thinking about that and how useful is that? Based on that day, that month, year? How long is it good for?

**Answer:** Xcel Energy clarified that minimum loading data is updated annually (in the fall timeframe).

**Study Processes & Deadlines**

PreMNDIP 1st Round Studies: 3  
PreMNDIP Restudies: 37  
MNDIP Studies: 12

Xcel Energy was trying to go beyond tariff requirements to perform restudies within 30 days, this was discussed last Quarter as to why this was not working. Xcel Energy is now following the tariff outlined process for restudies.

A lot of locations will reach a capacity threshold triggering a large amount of upgrades required, and high costs; if there are multiple projects in queue that the first project through takes a pass on it, and as each project slots up to the restudy bank and passes Xcel Energy keep moving down the line and revises the queue.

In the deeper queues – dates start getting really far out. If Xcel Energy stacks all tariff deadlines we are looking at 2-3 years out for some studies. Obviously they will get day for day extensions as appropriate (discussed shortly), but clearly it will impact a lot of other efforts within these projects.
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Four ideas to speed up and accommodate for timelines:

1) **Cluster Study Pilot:**

Cluster studies could enable results for deep queues in a more reasonable timeline. If there’s a single developer with multiple in queue, (4, 5, 6,) at the same feeder and substation, cluster would allow the developer to spread the high upgrade cost across multiple projects while enabling them to get them done economically.

Xcel Energy cannot broker any cost sharing between developers. Need to be the same developer/corporate affiliates.

Xcel Energy has revamped cluster proposal since Q3, to make it more accessible for developers. For example the largest difference is that developers no longer have to go forward with all five projects in queue, but can possibly go forward with the first three and the other two can be individual. Xcel Energy is calling it the “Hybrid” Cluster, with hybrid pricing. This solution was intended for Pre-MNDIP projects. MNDIP will address clusters.

**Question:** Are developers permitted to request or does Xcel Energy reach out to developer only?

**Answer:** Both. For cluster studies – the cluster cost is different than sequentially putting them all through individually, and will generally costs less overall. Timing – cluster will take longer than one single study, but less time overall. They do need to be concurrent in queue.

**Question:** A facility users group that we use to solve this on the aggregate?

**Answer:** Organizations we reach out to peer to peer, that also help and facilitate those things.

Xcel Energy asked whether or not anyone knew of any cluster studies complete in other states that could be used as a model. Developers suggested looking at the state of NY, however, they are struggling a bit with the governor’s enforced mandate.

**Question:** Are you okay with multiple developers going in together on this?

**Answer:** Potentially, down the road; but Xcel Energy cannot release that information or be the broker. Xcel Energy keeps all this information secure and confidential for the developer’s sake; however, they asked whether developers cared and continue to want them to? Are developers okay with Xcel Energy sharing this information so they can work together?

Colorado does this today; developers think Minnesota should do this as well. Others agreed, developers all have to be in, can’t be an opt-in/opt-out case by case basis. Developers would be in support of a public queue with this sharing information.

Reminder that if a developer reaches out to SRCMN saying please share my information with those ahead in queue to see if we can work together, Xcel Energy can share yours. Xcel Energy does need to stay within our customer data privacy rules.
Developers decided that they reach out internally to their teams to make sure they are ok with this.

MnSEIA noted they had a system internally that can do this, not today but it might be able to be done online to expedite.

A developer commented that the 30-day window from receiving IA packet to know cost is a short window to be able to work with other developers to create a deal. The requirement to pay IA within 30 days is not an Xcel Energy requirement (State).

2) No Upgrades Required

What is the value is of the curtailed amount that Xcel Energy provides in the studies to developers? The values are next to nothing, Xcel Energy has internally decided on less than 10%, that they do not go through added effort to go into the cost for that. What size should that be according to developers? Some developers said 50%, others thought that was high. Xcel wanted everyone to consider and revisit.

**Question**: How much does it save the team to look at 20% vs. 50%?

Once Xcel Energy has identified a specific level, if that percent decided on fails we move on. It saves 5-10% on the entire study. How many studies do you save that on? If it’s 10% you save less than if it’s 50%. This was one idea to make it faster to get studies through without removing any value for the developers.

*Some developer votes for above: 20-50%. / It all depends on the different factors. Larger/Smaller gardens, etc. 20% or even 10% / Value at looking at a redacted study at 50% /

This is an above and beyond deliverable that Xcel Energy has been doing outside of the rest of the study. The same resources doing this is the same resources doing the studies, which is adding time to each study making them all take longer. Make sure it’s value developers are going to use vs. wanting it for later use. Xcel Energy already provides the information required for those, outside of transformer upgrades. There are a number of costs associated with building these gardens and the smaller the garden the less revenue.

*Can MnSEIA do a similar poll for all developers on what this % should be?*

We are asking for input but not necessarily saying the decision is in the developer’s hands. We still have timelines to meet and will need to make an executive decision. After the Q3 meeting we have been using 10% as the threshold.

There was a suggestion that Xcel Energy should include an input for developers to decide what threshold they want to be considered for each individual project. This could create more work for Xcel Energy engineers to check that the correct threshold was used for each study.

3) Restudies – Extensions
Xcel Energy is proposing to file an Amendment to Standard Contract for Solar*Rewards Community regarding extending mechanical completion deadline for an application later in queue, that would cater to projects for example whose Mechanical Completion due date is in 2021, but the restudy is not due until 2022. Xcel Energy is open for feedback before filing. As for timing, this particular Amendment has not been filed yet, and once it has been there is a 30 day period for comments. We are trying to get ahead of this to address, since the situation it is out of everyone’s hands with these deep queues.

4) Requesting Site Shift (Pre-MNDIP)

Xcel Energy has seen a lot of site shifting once a garden is in Design/Construction phase.

Program Start: No site shifting or POI moves, if this was going to happen a garden would have to withdrawal and resubmit a new application. Later in the program, Xcel Energy received a lot of feedback that developers were having problems were permitting. New program rule: Allow request to shift site up to ½ mile fence to fence. If requires restudy, move to back of queue and pay cost of $22,000.

Goal is to reduce amount of restudies, while being flexible and accommodating as things come up.

New Rule: No queue movement can be done. Moving forward if site shift requires a restudy it is not approved by the program. This is applicable to pre-MNIP projects. For example, if developers need to move the POI for an easement and can do so without triggering restudies, go ahead. A developer cannot move across the road and down the street and triggering restudies for everyone else in queue. If restudies are not required and its minor adjustments, it might be okay.

If relocations have already been approved, Xcel Energy will not go back on approval. If tomorrow you ask for a site shift and will trigger a restudy the answer will be no.

Half mile is a general rule, there are times where 1000 ft. movement will trigger a restudy. It all depends.

Xcel Energy wants everything to be uploaded to the portal, so we have a timestamp and record of the most recent docs for everything.

Question: If no one is behind you in queue and it triggers a restudy, can you still do that?

Answer: Xcel Energy will have to discuss internally, as they trying to reduce all restudies. Potential issues could be messy paper trails, and only one application fee for two “projects”.

The ½ mile rule came along initially from engineering saying everything over ½ mile has to be restudied, within it Xcel Energy can look at it and review it to see if it raises red flags if it needs to be restudied. New rule is that it just cannot require a restudy (but everything over a ½ mile will require a restudy).
Design has seen a lot of gardens where POI’s stay the same but panels move from where they were initially supposed to be.

Projects subject to MNDIP will adhere to Material Modification rules.

-Intermission-

III. Construction Updates

Design & Construction

Establishing ISD – Establish them early (usually after a site meeting and different variables once Xcel Energy knows the county and permits are understood. Some counties are easier/more difficult so it needs to be established right away or we might have to reach out to the county for the okay). Xcel Energy does our best to establish those as soon as we can.

Permitting, other projects in queue dropping out, some work for other parties (non-solar) has to be done before garden work. Xcel Energy does not want to move the ISD if they do not need to but sometimes it needs to happen because our system is very fluid on the distribution side.

ISD means Xcel Energy is complete and developer is complete on all sides. Sometimes Xcel Energy will be ready to work and there are delays from developer side, which we understand but need to know ASAP.

Question: if ISD has to move out due to permitting, does the designer reach out to the developer?

Answer: Yes; Xcel Energy will reach out and do everything they can to not move the ISD.

Question: 8 weeks prior to ISD trying to understand Xcel Energy’s construction better. Run into situations where construction time frame is 8-10 weeks, if designers are out there at 8 weeks we might just be getting started. We’ve run into it where Xcel Energy’s construction wants to be ahead of ours which pushes back the ISD. How can we facilitate better communication on that?

Answer: The reason why, might be because every garden has an ISD of Nov. 1st. So Xcel Energy has to start ahead of time in order to get them all completed by Nov. 1st. Xcel Energy does not like to do ‘just in time’ construction.

Question: How can we increase and improve the communication so we can get our construction done in the timeframe that Xcel Energy might need us to in case Xcel Energy is ahead of schedule.

Answer: Date Management

• *8 weeks prior to ISD – request first in, first out. Energization/Acceptance will follow shortly after ISD.
• Don’t wait for 4th quarter, so everyone has the same ISD because they waited until 4th quarter.
• If there’s any way developers can move up to the summer /spring that would be great.
Meeting Minutes

- Make sure insurance and testing procedures are in 6 weeks prior to ISD (and approved)
- Assume [metering] docs are approved if developers have not heard anything from the PMO.
- 10 days prior to ISD, make sure all Section 10 requirements plus electrical inspection is complete.

**Question:** Do you need all design docs? **Answer:** Only what we’re being inspected on.

**Question:** Once it submitted, do I need to continue to track and reach out to make sure they’re uploaded?

**Answer:** You need to reach out to SRCMN inbox, approval process goes on behind the scenes. Release two will have a lot more visibility. Program can always look into these if developers reach out.

If an ISD is decided on but Xcel Energy then finds out that an outside influence is in the way and Xcel Energy cannot be ready to go, they will come back and have to reschedule your ISD.

**Question:** Can we request the Site Designers have the ISD approved?

**Answer:** There are multiple potential events that will impact the ISD’s, Xcel Energy does everything they can to keep that from happening, but these dates are never set in stone and there is always risk that something may have to be moved. Sometimes Xcel Energy is not in control.

**Question:** Metering confirmation – we’ve been told we assume no news is good news?

**Answer:** Xcel Energy is looking at a lot of changes to Salesforce that take time & money. We can take this back to metering to see if there’s something we can add internally for them.

**Waitlist:** Ends 12/31/19. Crystal will send out this week, first come first serve date & timestamped in Email, must follow rules to a T to qualify. Xcel Energy will need an answer within 24 hours as they move on to the next person on the waitlist.

**Inclement weather reschedule:** Does take us about two weeks to get everything rescheduled.

**Storm/Mutual Aid:** Restoring power to customers as well as utilities to mutual aid agreements, when Xcel Energy gets called we will go and impacts all dates equally.

**Question:** Waitlist response within the 24 hours, will it be a typical offer for both energization & witness testing? **Answer:** Yes, both.

**Overview of projects**

459 projects in Design/Construction, 246 w/ PTO, totaling 631 MW, 72 in construction, 79 in design, 13 on HOLD, 49 cancelled. Q4 ISD’s: 44 sites, 52 MW.
**Meeting Minutes**

**Requirements for Commercial Operation** Where you can find this on the Website, linked to all our email signatures, go to Step 5. Xcel Energy provides the table document so you are aware of details as you go through the process.

Guideline for Large PV Acceptance/Witness Testing - Same as Above

**IV. Regulatory Update**

**Outages – CSG’s**

3 types of outages or disconnections:

- **Generation Issue**: problem, hasn’t passed acceptance testing, over generating, out of compliance with the IA. You’re notified and given so many days to comply prior to Disconnection, unless it’s a safety issue.

- **Emergency Outages**: Storms going through our territory, all customers are out on the system

- **Planned Outages**: Routine maintenance, repairs, modifications, upgrades to projects.

Xcel Energy is reviewing how to report on planned outages moving forward:

What is a planned outage & how are they addressed? Xcel Energy’s protocol is when they know they will take it offline to do work on a feeder for any project, they plan it. Developers get a call from the control center maybe a week or so before the project. That day or a day before they will say they are taking it offline tomorrow.

**Hotline Work Safety**

**Mitigations**: On-Off daily for multi-day work? Can take hours and adds to number of days needed to complete the projects.

CSG work – a lot of the planned outages – only do CSG construction in off-peak production seasons. Xcel Energy can do construction during the winter months so sites do not go offline during the key production months. About 1/2 the time is because they are adding another garden.

Cluster Studies would help this as Xcel Energy would have a group of studies on the same feeder.

Garden Operators explained that if Xcel Energy knows they will be doing a series of work over a span of time, Garden Operators need to know why it’s down for documentation so financiers know it’s not due to Operator equipment, but because of something planned by Xcel Energy.

**Why is this so hard to report?**

For MSP footprint: multiple control centers, those initiated processes is a critical role. All documentation in these control centers is required to be on paper, and is done manually and for all customers not just CSG’s.
If Xcel Energy were somehow able to run a report, what more would developers need other than: SRC#, Outage Start Date, Outage End Date, Duration of Outage, and Reasons for Outage? Outages cause a lot more work and operational time as well, no one wants these to go offline, Xcel Energy wants to work together to find different solutions. There is human error in all of the manual processes.

**Suggestion:** Talking to a development consultant about an API to get the different systems to talk to each other may help the manual process currently at use.

Is the garden community interested in paying extra cost, as Participation Cost for SRC will potentially increase? Xcel Energy needs to know about as there are different avenues here.

**Single Meter Billing Impact**

Previously the group decided to go with a single meter configuration. Reminder: there are billing implications to the single meter change. Tariff changes to align tariff with the Amendment and the Standard Contract were handed out at the meeting.

**Workgroup Comments**

CSG Developer Group put together Comments – digitizing consent forms & 25 year extension.

Digitizing: look into digitizing subscriber forms; they currently use the SAA tariff form which requires PUC approval. Easier ways developers can get subscribers usage information using the My Account option. Can provide developer name as approved 3rd party in My Account. Can reach out to SRCMN with questions. Does this help meet the concern? Usage data is in My Account with the last 12 months. This removes the need for data consent form.

**Extending 25 year life history**

Xcel Energy considers this to be high price solar, extending beyond the 25 year does not seem prudent. Xcel Energy would be extending the timeline that they pay over and above what they can get the solar from other resources.

**Question:** At a price, do you want to do a walkup rate at x% value to lock in an extra x years?

Xcel Energy reiterated that it is hard to say now because they do not know 25 years from now what the laws or costs will be. Even the PPA’s we sign seldom go that long.

**V. Miscellaneous Topics**

Our next meeting is scheduled on January 27, 2020.

Minutes submitted by: Jessica Peterson, Xcel Energy

Approved by: SRC Workgroup on 1/27/20
Stakeholder Workgroup – Solar*Rewards Community

11.7.2019
Agenda

1:00   Welcome and Approval of Minutes (David)

1:10   Program Detail Discussion (Crystal/Rehana/Cale)
   a. Program Status
   b. E911 and Billing Information
   c. Late Fees Expectations
   d. Proof of Site Control Clarification
   e. Portal Update
   f. Billing & Subscribers
   g. REC Claims

2:30   Design/Construction Update (Dave/Brenda)
   a. Energization/Acceptance Schedule – 2019/2020
   b. Overall Update

- Intermission -

3:00   Regulatory Update (Crystal/Kerry)
   a. Outages – Processes and Reporting Requirements
   b. Privacy Rules
   c. Single-Meter Solution Billing

1:45   Engineering Update (John/Alan/Ed)
   a. Study Timing Update
   b. Cluster Study Pilot
   c. “No Upgrades Required” Threshold
   d. Restudy Extensions in long queues
   e. Site Shifts

3:15   Open Discussion & Wrap-up (David)
Approval of Minutes
Program Details
Program Reminders—Contact Info

• E911 Address (Physical site address)
  – AHJ Documentation required Step #5 – Design/Construct
  – Amendment to IA
  – FastApp using E911
    • Premise #’s in portal 20 weeks prior to ISD for meter order

• Billing Contact Information Verification
  – 10 days prior to energization
  – Reach out to SRCMN to request what is currently listed
Program Updates-MNDIP Site Control

- You can find requirements in the MNDIP, (Section 10 Tariff)
- Xcel Energy looking for two key components:
  - **Location** of site control matches location of application
    - GPS Coordinates (in DD format, not DMS)
    - Including a diagram that visually corresponds to site plan
  - **Entity name** that has control of site, matches entity name (LLC) on the application
    - An “Assignment of Lease” for example, can help with this
- You can redact personal information about the lessor
MRETS and EIA #’s

• Garden Operator registers with **EIA:**
  – U.S. Energy Information Administration: EIA-860, EIA-923
  – 1 MW-ac and greater required by law
  – EIA 5-digit Code (within week)
  – [https://www.seia.org/initiatives/eia-generation-forms](https://www.seia.org/initiatives/eia-generation-forms)

• Xcel Energy registers with **MRETS:**
  – [Signed MRETs Registration–Schedule A(PDF)](https://www.seia.org/initiatives/eia-generation-forms)
  – [Signed MRETs Registration–Registration Template(XLSX)](https://www.seia.org/initiatives/eia-generation-forms)
  – EIA 5-digit Code within each
Program Reminders–Late Fees

- Late Fee with 6 Month Extension (for Achieving Mechanical Completion after 24 Months)
- Late Fee with 12 Month Extension (for Achieving Mechanical Completion after 24 Months)
- What to expect:
  - A separate late fee invoice from SRCMN
  - A separate interconnection invoice or check from Xcel Energy
- Amendments give ability (not requirement) to combine with final interconnection invoices
  - We will not combine these.
Program Updates–Portal Changes

• Release #2 – December 2019
  – For new, in-progress applications only
    • Active gardens can be managed in current portal or new portal
  – E-signatures
  – E-payments
  – Automated approval processes built in:
    • Insurance, testing procedures, as-built engineering documents
• Additional training coming soon!
Program Reminders—Billing Issues

• Potential issues Developers can see:
  1. Delay in Bill Credits – Subscribers
  2. Delay in Monthly Owners Report (MOR) – Garden Operators

• Cause of Issues:
  1. Backdating PTO (both)
  2. Metering Communications (both)
  3. Enrollment Changes (both)
  4. Transferring data to MOR (Garden Operators)
1. Backdating PTO

- Can cause delays in bill credits to subscriber and MOR
  - PTO at month end, but outstanding requirements and PTO letter is sent following month
    - Anticipate a delay
  - What can you do?
    - Ensure requirements are met BEFORE testing, so testing approval and billing begin same day
  - OR we can stop backdating PTO
2. Metering Communications

• Can cause delays in bill credits to subscriber and MOR
• Root causes related to Xcel Energy or Developer
  – What are we doing?
    • SRCMN email notification when discovered
    • Issue = ours: Dispatch technicians to resolve
  – What can you do?
    • Communicate internally
    • Issue = developers: Timely resolve, respond to communication
3. Enrollment Changes

- Subscriber changes can affect enrollments, switch to invalid
- Affects bill credits for that particular subscriber
- Can affect garden as a whole

- What can you do?
  - Subscriber management team
  - All enrollments should be valid
4. Transferring data to MOR

- Automated, monthly transfer process
- Production data from metering/billing system to Salesforce
- Does not affect customer bill credits, only Salesforce reporting
- < 100 subscriptions with errors
  - 100 / 17,000 unique subscriptions = 0.00588%

- What are we doing?
  - Additional validations implemented to reduce error
Subscriber Timeline Overview

• 25th of month – All subscriptions valid (minimum)

• End of month – Allocation snap shot

• 9th of month – Bill Credits post

• 15th of month – MOR posts
Program Updates–Subscribers

SOLAR*REWARDS COMMUNITY SUBSCRIBER BILLING DATE IS CHANGING
STARTING MARCH 1, 2020 ALL SOLAR GARDEN SUBSCRIBER BILLING DATES WILL CHANGE TO THE 20TH OF EACH MONTH

How this affects you:

• Your Solar*Rewards Community bill credits will now align with your standard billing cycle and will appear on your Xcel Energy bill every month.
• No more credit gaps – Solar*Rewards Community bill credits are posted in the actual month of your bill.
• No more duplicate credits – Solar*Rewards Community bill credits will not be postponed or duplicated on the next month’s bill.
• Your Xcel Energy bill will be sent on the 20th of each month.
• This change requires no action from you.

WANT TO KEEP YOUR CURRENT BILLING DATE?

Opt out by sending your Xcel Energy account number to SolarRewardsCommunity@xcelenergy.com, Subject: BILL DATE OPT OUT.
Program Updates—Subscribers

Excess bill credits

• #1 Question: When?
  – Annually
  – [website link](www.xcelenergy.com/SolarRewardsCommunity)

• #2 Question: Why?
  – Solar alternative to on-site
  – Not a “money-maker”
  – 120% rule based on annual usage, net-out once a year
### SOLAR*REWARDS COMMUNITY PROGRAM

(Continued)

<table>
<thead>
<tr>
<th>RATE APPLICATION</th>
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<tbody>
<tr>
<td>The Company will buy (through Bill Credits to the subscribers) all subscribed energy generated by the Community Solar Garden and delivered to the Company during a particular calendar production month at the Bill Credit Rate. Each subscriber to the Solar*Rewards Community Program will receive a Bill Credit at the Bill Credit Rate for electricity generated attributable to the subscriber's subscription. Each subscriber will also be charged for all electricity consumed by the subscriber at the applicable rate schedule for sales to that class of customer. If the Bill Credit exceeds the amount owed in any billing period, the excess portion of the Bill Credit in any billing period shall be carried forward and credited against all charges. The Company shall purchase all Bill Credits with the billing statement which includes the last day in February and restart the credit cycle on the following period with a zero credit balance. Consistent with Minn. R. 7820.3800, Subp. 2, the purchase of the Bill Credits will only be made when the Bill Credit amount is more than $1 due for an existing customer or $2 or more due a person or legal entity who is no longer a customer of the Company.</td>
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</table>
Program Updates—Subscribers

• Door-to-door sales/marketing techniques
• Scam complaints
• Let local authorities know you are doing this
• Peddlers license – jurisdiction authority
  – To eliminate the police chief asking what’s going on
  – Confirm if you need licenses/permission
  – What you can or cannot say
• You cannot insinuate you are with Xcel Energy
  – Provide clear explanation of roles
REC Claims (Kerry)

• Curious about how this fits into your sustainability goals? Learn about Renewable Energy Claims.
Engineering Update
Hosting Capacity Map Update

- [https://www.xcelenergy.com/working_with_us/how_to_interconnect/hosting_capacity_map](https://www.xcelenergy.com/working_with_us/how_to_interconnect/hosting_capacity_map)
Pre-Application Reports–Data Reminder

- Data in pre-application reports is existing, readily available data that the utility has access to.
  - MNDIP workgroup discussion clarified that “access to data” means desktop data, not going into the field on each project.

- Pre-application report data is informational only and does not guarantee anything to the applicant:
  - Assumptions made by developer based on data presented do not guarantee capacity
  - Application and study is required to determine actual interconnection feasibility
Study Processes and Deadlines
Current Situation

Pre-MNDIP 1\textsuperscript{st} Round Studies = 3
Pre-MNDIP Restudies = 37

(MNDIP Studies = 12)
Restudies – How we got here

Trying to go beyond tariff requirements to perform all re-studies within 30 days

Mid-stream queue changes leading to frequent re-starts

Missed expectations, frustration, unclear timelines and limited chance at success for anyone

High costs passed from cancelled project to next in queue, triggering re-study/delay for the rest of the queue

We share study status during bi-weekly calls, information doesn’t always pass on within the developer company

We can’t share non-public queue details (developer, projects, costs) with other developers

Early in queue studies also delayed due to trying to meet re-study targets no matter what, so everything is delayed

Xcel Energy is spending much money on many rounds of re-studies within the same queue
Study Timeline, Deadlines & Process

• Section 9 (68.7)

iv. Where another Engineering Scoping Study needs to be performed for any applicant later in the Study Queue on account of an applicant ahead of it deciding not to proceed with an Interconnection Agreement, the Company will not charge an additional Engineering Scoping Study fee for those in the Study Queue behind the applicant which decided not to proceed with a signed Interconnection Agreement. Any such additional Engineering Scoping Study will take time to develop and will be completed within 30 business days after the deadline for the applicant next ahead of it in the Study Queue to sign an Interconnection Agreement without one being signed. Once applicant receives the results of this additional Engineering Scoping Study, payments and providing appropriate letter of credit for unpaid balance must be completed within 30 days after Company notice to applicant of the payment amount which is due, or the application will be removed from the Study Queue and the applicant will be required to start a new Community Solar Garden application if it later determines it wants to proceed.

• MNDIP

The construct of MNDIP is based on sequential studies, which is written throughout the tariff.
Deeper queues of 20+ could take 3 years to work through re-studies.
Planned Approach

• Study Deadlines
  – If queue changes mid-stream, timeline restarts, starting with next in queue behind cancellation
  – Will reflect tariff requirements for compliance reporting

• Study Prioritization
  – Near-term tariff deadlines are top priority

• Potential Solutions:
  – Modified process (sequential but faster) - (already doing)
  – 1. Cluster pilot
  – 2. Changes to “No Upgrades Required” Process
  – 3. Amendment granting Extensions to the Required Completion dates
  – 4. Site Shifts – Program process change
1. Clustered Studies Pilot

Benefits

• Results for deep queues in more reasonable timeline
• Shared upgrade costs across projects (individual IAs/payments for each based on sequential cost estimate – developer spread costs on its side across multiple)
• Results delivered identify price-break thresholds (similar to 5MW studies)
• Aligns with developer view of “portfolio”

Requirements

• Same developer/corporate affiliates
• Same substation & feeder
• Sequential Study Queue order (ex. #4, 5 & 6 in same queue)
• Go/no-go based on sequential queue order without skipping projects ahead in queue
2. No Upgrades Required–Current

• IA lists 1MW and required upgrades to accommodate
• IA also lists the amount of MW available, without upgrades

• If no upgrade option is <10% of requested capacity, Xcel does not fully scope and call out that option:
  • Ex. 1 MW project, ~75 kW is available without upgrades
  • Xcel states: “less than 10% of the requested capacity is available without upgrades” rather than spend additional time analyzing to find exact value
2. No Upgrades Required—Future

• Last meeting, Xcel Energy asked for feedback on whether 10% is a good threshold.
  – Xcel Energy could increase this threshold if desired, in efforts to further speed up study timelines.
• Developers suggest 50% rather than 10%
• Is there a specific CSG size instead of percentage?
• Xcel Energy suggested developers think about this
  – To discuss further at next workgroup
3. Restudies–Extensions

• Amendment to Standard Contract for Solar*Rewards Community (Regarding Extending Mechanical Completion Deadline for an Application Later in Queue)
  – for both Pre-MN DIP and MNDIP Applications

• Amendments available in the Outlook Calendar Invitation for review
  – Open for feedback before filing
4. Requesting a Site Shift (Pre-MNDIP): History & Old Process

• Program start:
  – No shift in site or POI once deemed complete
  – Officially withdraw and resubmit at newly proposed site

• Program past accommodations:
  – Permitting issues
  – Built program rule: allow request up to ½ mile fence to fence (executed & paid interconnection agreement)
  – Restudy required: back of queue, restudy cost ($22,000)
4. Requesting a Site Shift (Pre-MNDIP): New Process

- Goal = Reduce restudies

- No longer ½ mile rule
- No queue movement
- Requires a Restudy = Not approved
- Restudy is Not Required = Approved
- “Shopping” for sites at this stage is not allowed
4. Comparison to MNDIP Process

- **Material Modification** – A modification to machine data, equipment configuration or to the interconnection site of the DER at any time after receiving notification by the Area EPS Operator of a complete Interconnection Application that has a material impact on the cost, timing, or design of any interconnection Facilities or Upgrades, or a material impact on the cost, timing or design of any Interconnection Application with a later Queue Position or the safety or reliability of the Area EPS.
Construction Update
Design and Construction

- Establishing ISD
  - Once scope is determined; consideration for design and construction duration
  - Items that have/will impacted ISD
    - Permitting
    - Projects ahead in queue drop causing restudies
    - Scope change causing re-studies
  - ISD means both Xcel AND the Developer will be field completed by that date - if there's no progress within 8 weeks prior to ISD, Xcel may move the ISD to allow other parties to gain energization and acceptance
Design and Construction

• Date management
  – 8 weeks prior to ISD
    • Request – first in, first out
    • Energization/acceptance will follow shortly after ISD
  – 6 weeks prior to ISD
    • Insurance, testing procedures
  – 10 days prior to ISD
    • All section 10 requirement plus electrical inspection
Design and Construction

• Waitlist (Ends 12/31/19)
  – Qualification
  – First come first eligible
  – 24hr PAM response
• Inclement weather reschedule
  – 2-weeks
• Storm/Mutual Aid
  – Will impact all dates equally
Design and Construction Overview

459 projects in Design & Construction (+16)

• 246 projects with PTO - 631mw (+29)
• 72 projects In-Construction - 85mw (+6)
  • 79 projects In-Design - 80mw (-20)
  • 13 projects on HOLD - 13mw (+1)
• 49 projects have canceled - 122mw (Push)

2019 ISD

Q4 – 44 sites, 52mw

Q1 2020 – 43 sites, 51mw
Q2 2020 – 74 sites, 75mw
Q3 2020 – 4 sites, 4mw
Q4 2020 – 2 sites, 2mw
Q4 2019 Waitlist

Xcel Energy will implement a temporary waitlist for the Q4 Energization/Acceptance test schedule. The objective of the waitlist is to meet the overall need to enrich the current schedule and to provide an opportunity for projects that have fully demonstrated readiness to be energized in 2019. At this point, all 2019 energization and acceptance test dates are locked in, and Xcel Energy will not accommodate any operator requested date shifts for the remainder of 2019.

The Q4 2019 waitlist will be open to applications that do not currently have a scheduled energization and acceptance test date between today and 12/31/19. Applications with dates scheduled after 12/31/19 will be eligible to be placed into the waitlist on a 'first come first served' basis once the following milestones have been met:

- All section 10 requirement have been complete, approved and uploaded to salesforce (SRCMN will email gardener operators once complete)
- Construction and field work has been completed and verified on both Developer and Utility side (Gardener operators are responsible to email SRCMN@xcelenergy.com when all field work is completed on their end)

If an energization/acceptance test date becomes available in Q4 2019, Xcel Energy will reach out directly to the primary application manager of the first eligible project on the waitlist. The PAM will have 24 hours to respond to accept the available time slot; if there is no timely response or the operator elects not to accept, Xcel Energy will reach out to the next eligible project. Please note, eligible projects on the waitlist will only be given one opportunity to accept an available date. If a project is offered a date and does not timely respond to or accept that date, it will be removed from the waitlist.

Please reach out to SRCMN@xcelenergy.com if you have any specific questions/inquiries on the Waitlist and process outlined above. In addition, please continue to reference the SRCMN Commercial Operation Process Document (attached) as it is critical resource that outlines processes, terminology and key milestone dates.
Requirements for Commercial Operation

- [www.xcelenergy.com/SRCResources](http://www.xcelenergy.com/SRCResources)

**Step 5 - Design and Construction**

Step 5 consists of the Design and Construction phase, which begins once an Interconnection Agreement has been executed. An Xcel Energy designer will be assigned to the project, who becomes the main point of contact throughout the Design and Construction process.

- Requirements for Commercial Operation (Design/Construction Process Overview)
- Installation and Shipping Process for Meter Equipment

**Requirements for Commercial Operation (Design/Construction Process Overview)**
Guideline for Large PV Acceptance/Witness Test

- www.xcelenergy.com/SRCResources

Step 7 - Witness Testing & Application Completion

Garden Operators must successfully perform witness testing of the solar garden facility. Please review the supporting documents below for guidance on requirements during witness testing.

- MN Community Solar Commissioning Guidelines v1.5 (PDF)
- Xcel Energy Developer Quick Reference for Large PV Acceptance-Witness Testing Ver 1.3 (PDF)

- Xcel Energy Developer Quick Reference for Large PV Acceptance-Witness Testing Ver 1.3 (PDF)
Regulatory Update
Disconnections—CSG’s

Three types of disconnections:

1. **Generation Issue:** falling out of compliance with Interconnection Agreement (or MN DIA);
2. **Emergency Outages:** storm restoration for example; and
3. **Planned Outages:** routine maintenance, repairs and modifications of the electric distribution system.

We are reviewing how to report on **Planned Outages** moving forward.
Discussion: Planned Outages

1) What is a planned outage and how are they addressed?
2) Hot line work/safety
3) Mitigations
   1) On-off daily for multi-day work?
      1) Can take hours and adds to number of days needed to complete projects
   2) CSG Work (large percentage of planned outages)
      1) Only do CSG construction in off-peak production seasons
   3) Jurisdictional requests are outside Xcel Energy control
Why is this so hard to report?

- Control Center initiated process is one of many critical roles
- Paper records for auditable reporting
- Records are for all customers not just CSG’s
- Manual sort and compilation to report on CSG outages

So…
- We are continuing to explore what we can do
- Help us understand what you need
Future Reporting

• Quarterly Reporting

• Information to be provided (for discussion):

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<th>SRC Number</th>
<th>Outage Start Date</th>
<th>Outage End Date</th>
<th>Duration of Outage</th>
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<td>City/County</td>
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• Participation Cost for SRC will potentially increase
Potential Tariff Changes
CSG Privacy Requirement Change

• Currently:
  – Standard Contract for CSG’s (Section 9, 1st Revised Sheet No. 78) clearly states what can be disclosed upon signature

• We could adjust:
  – Contract (and tariff) to allow for additional disclosures: for detailed tracking, answers to subscriber questions, queue reporting, etc.

• Example: “Disclosure of Community Solar Garden Information. The Community Solar Garden Operator acknowledges and agrees that the Company may publicly disclose the street address for the Community Solar Garden Location, Community Solar Garden Operator (and previous ownership), nameplate capacity, SRC identification number, and generation data of the Community Solar Garden.”
**Single Meter Billing Impact**

- CSGs opted for one meter, removing house power meter
- **Billing impact** to this decision:
  - Two meter configuration - house power tracked separately from production
  - Single meter configuration - meter only collects energy sent to Company
    - Does not track production and usage separately:
      - Energy used at site is net out of production
      - Will lower production
      - No additional house power charged to developer
- Accompanying tariff adjustments available via print out
PUC Docket No. E-002/M-13-867 on February 8, 2019

C. THE COMMISSION SHOULD CONSIDER ADDITIONAL UPDATES TO MODERNIZE THE CSG PROGRAM

Given that the programmatic changes included in Xcel’s tariff revisions and in light of the recent and relevant decisions in this docket, CSG Developer Group respectfully requests that the Commission open a comment period to address potential program improvements that could be made for the future benefit of the program and its participants. CSG Developer Group anticipates comments may address an array of issues some of which may be reasonably efficient to implement while others might be somewhat more controversial or complex but could add substantial value. Such items, among others, could include: (1) allowing new electric vehicle owners to upsize their CSG subscription more quickly without waiting for a year’s usage data; (2) providing technical or online solutions that would make the process of signing up for residential subscribers more clear and efficient; (3) allowing for the use of advanced inverter functionality; (4) considering whether the program deposits should be released earlier in the process when the interconnection agreements are executed and estimated interconnection costs paid; (5) analyzing whether 5-year renewal periods could be added to material contracts to bring them more in line with the useful life of solar facilities; and (6) bringing interconnection study fees more in-line by capping them at a level reasonable for the scale and complexity of a project.
Digitizing Consent Forms

• Customers can provide developer name as approved third-party in **My Account**

• Xcel Energy needs to follow privacy guidelines:
  – Renewable Connect is an in-house program, no third-party rules
  – Renewable Connect was a My Account solution similar to #1
Extending the 25-Year Life–History

• **February 8, 2019 comments:**
  – “analyzing whether 5 year renewal periods could be added to material contracts to bring them more in line with the useful life of solar facilities”

• **February 22, 2019 reply comments:**
  – “We oppose the request to extend the 25 year Solar*Rewards Community contracts by 5 years. The Company had originally proposed a 20 year term, developers wanted to have a 25-year term. The Company determined that a 25 year term was appropriate based in part because this term length is consistent with the Value of Solar methodology. The Commission supported this in its April 7, 2014 order.”
  – “If the PV System is still in operation at the end of the 25 year term, it would be appropriate to consider at that time whether it would be proper to enter into a PPA based on then-current avoided-cost for some additional term consistent with what the law may allow or require at that time. There is no need for the Commission to take any action now on this proposal.”
Extending the 25-Year Life—Continued

• Commission did not take action on proposal earlier this year
  – Addressed at Q3 meeting – August 7, 2019.
• Not considering extending outside of a PPA agreement; Why?
  – 25 years = far into future
    • Laws and rates will change
  – Avoid lock in inappropriate rate
  – Aligning with VOS methodology (as previously stated)
Wrap Up

Open Discussion
Topics for next meeting?
2019 Schedule is Complete
2020 Schedule: Quarterly in-person?
CERTIFICATE OF SERVICE

I, Lynnette Sweet, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota; or

xx by electronic filing.

Docket No.: E002/M-13-867

Dated this 28th day of January 2020.

/s/

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Regulatory Administrator
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<td>Eric</td>
<td>Pasi</td>
<td><a href="mailto:ericp@ips-solar.com">ericp@ips-solar.com</a></td>
<td>IPS Solar</td>
<td>2670 Patton Rd Roseville, MN 55113</td>
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<td>Dan</td>
<td>Patry</td>
<td><a href="mailto:dpatry@sunedison.com">dpatry@sunedison.com</a></td>
<td>SunEdison</td>
<td>600 Clipper Drive Belmont, CA 94002</td>
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<td>Jeffrey C</td>
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<td>Paulson Law Office, Ltd.</td>
<td>4445 W 77th Street Suite 224 Edina, MN 55435</td>
<td>Electronic</td>
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<tr>
<td>Matthew</td>
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<td>Madel PA</td>
<td>800 Pence Bldg 800 Hennepin Ave Minneapolis, MN 55403</td>
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<td>Joyce</td>
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<td><a href="mailto:joyce@mrea.org">joyce@mrea.org</a></td>
<td>Minnesota Rural Electric Association</td>
<td>11640 73rd Ave N Maple Grove, MN 55369</td>
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<td>Generic</td>
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<td>Residential Utilities Division</td>
<td><a href="mailto:residential.utilities@ag.state.min.us">residential.utilities@ag.state.min.us</a></td>
<td>Office of the Attorney General-RUD 1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131</td>
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<tr>
<td>Isabel</td>
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<td><a href="mailto:ricker@fresh-energy.org">ricker@fresh-energy.org</a></td>
<td>Fresh Energy</td>
<td>408 Saint Peter Street Suite 220 Saint Paul, MN 55102</td>
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<td>Jonathan</td>
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<td>390 City Hall 15 West Kellogg Boulevard Saint Paul, MN 55102</td>
<td>Electronic Service</td>
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<td>Lynnette</td>
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<td>Xcel Energy</td>
<td>414 Nicollet Mall FL 7 Minneapolis, MN 554011993</td>
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<td>3963 8th Street SW Backus, MN 55435</td>
<td>Electronic Service</td>
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